

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

David William Wood,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 3:15CV594 (MHL)
	)	
EQUIFAX CREDIT INFORMATION	)	
SERVICES, LLC; EXPERIAN	)	
INFORMATION SOLUTIONS, INC.;	)	
TRANS UNION, LLC;	)	
CREDIT ONE BANK; and	)	
MIDLAND CREDIT MANAGEMENT, INC.	)	

**DEFENDANT CREDIT ONE BANK, N.A.'S  
RULE 26(a)(2) EXPERT DISCLOSURE**

**COMES NOW** Defendant Credit One Bank, N.A., by counsel, pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and this Court's February 25, 2016 Initial Pretrial Order, which require that each defending party shall identify and provide written reports for all persons it expects to call as expert witnesses in opposition to any complaint, counterclaim, cross-claim, or third-party complaint on or before ninety (90) days before trial, and hereby states follows:

**(A) Identity of Expert Witness:**

James F. Lynn,  
The Lynn Group, Inc.,  
613 Eldridge Drive, Suite 200,  
Silver Spring, Maryland  
(301) 680-2599

**(B) Written Report:** A complete statement of all opinions Mr. Lynn will express and the basis and reasons for them are set forth in Exhibit A. The facts or data considered by Mr. Lynn in forming his opinions in this matter are set forth in Exhibit A and Exhibit B. The exhibits that Mr. Lynn will use to summarize or support his opinions in this matter are set forth in Exhibit B. Mr. Lynn's qualifications, including a list of all publications authored in the previous 10 years

are set forth in Exhibit B and Exhibit C. A list of all other cases in which, during the previous 4 years, Mr. Lynn testified at trial or by deposition are set forth in Exhibit B. A statement of the compensation to be paid to Mr. Lynn for the study and testimony in this case is set forth in Exhibit B.

**CREDIT ONE BANK, N.A.**

By Counsel,

/s/

Lauren M. Cafferty (VSB# 83712)  
McGuireWoods LLP  
2001 K Street N.W., Suite 400  
Washington, DC 20006-1040  
202.857.1733 (Direct Line)  
202.828.3332 (Fax)  
lcafferty@mcguirewoods.com

Christopher J. Sears (*pro hac vice*)  
CIPRIANI & WERNER, PC  
400 Tracy Way, Suite 110  
Charleston, WV 25311  
(304) 341-0500 (t)  
(304) 341-0507 (f)  
csears@c-wlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of July, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

Leonard A. Bennett  
Susan M. Rotkis  
Consumer Litigation Associates, P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, VA 23601  
*Counsel for Plaintiff*

/s/ \_\_\_\_\_  
Lauren M. Cafferty  
Virginia State Bar No. 83712  
McGuireWoods LLP  
2001 K Street N.W., Suite 400  
Washington, DC 20006-1040  
202.857.1733 (Direct Line)  
202.828.3332 (Fax)  
lcafferty@mcguirewoods.com